

NANCI L. CLARENCE (State Bar No. 122286)
CRAIG H. BESSENGER (State Bar No. 245787)
CLARENCE & DYER LLP
899 Ellis Street
San Francisco, California 94109
Telephone: 415.749.1800
Facsimile: 415.749.1694
Email: nclarence@clarencedyer.com
cbessenger@clarencedyer.com

Attorneys for Defendant Jeffrey Harrison

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY HARRISON,

Defendant.

CR No.: 07-0594 PJH

**STIPULATION AND ~~PROPOSED~~
ORDER GRANTING DEFENDANT
JEFFREY HARRISON'S TRAVEL
REQUEST**

Defendant Jeffrey Harrison has been released subject to the Court's terms and conditions of release. A current condition of Mr. Harrison's release is that he obtain approval from Pretrial Services for any travel that is both outside the Northern District of California and within the State of California. Defendant Harrison has sought approval from Pretrial Services to travel to, and stay overnight in, Los Angeles, California, from March 22, 2008 through March 23, 2008. Although Mr. Harrison may conduct such travel with the approval of Pretrial Services, Pretrial Services has asked that he obtain the Court's permission for this trip. Mr. Harrison now respectfully seeks that permission.

The purpose of the proposed travel is to allow Mr. Harrison to attend his son Ashley's wedding, which will take place at a private residence in Los Angeles on March 22, 2008. Mr. Harrison will be traveling with his wife and two children, and will be staying at a hotel in Los Angeles. The Harrison family's flight will depart from Oakland, California at 7:20 a.m.

1 on March 22, 2008 and arrive in Burbank, California at 8:25 a.m. the same day. Their return
 2 flight will depart from Burbank at 11:15 a.m. on March 23, 2008 and arrive in Oakland at 12:25
 3 p.m. the same day. Prior to his travel, Mr. Harrison will provide to Pretrial Services his itinerary,
 4 including more information regarding his flights and the hotel at which he and his family will
 5 stay. Mr. Harrison previously surrendered his passport, which remains in the Court Clerk's
 6 custody.

7 Undersigned defense counsel has discussed Mr. Harrison's proposed trip with both
 8 Rich Sarlatte, who is Mr. Harrison's Pretrial Services Officer, and Assistant United States
 9 Attorney Denise Marie Barton. They have stated they do not oppose the Court's approval of Mr.
 10 Harrison's travel to Los Angeles for the period from March 22, 2008 through March 23, 2008. It
 11 is also agreed that Mr. Harrison may depart his residence prior to his 6 a.m. curfew on March 22,
 12 2008 due to the early departure of his flight from Oakland to Los Angeles. All parties agree that
 13 Mr. Harrison will report to his Pretrial Services Officer on March 23, 2008, the day of his return
 14 from Los Angeles, as well as comply with other requests from Pretrial Services.

15
 16 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17
 18 Dated: March 11, 2008


 Honorable James Larson
 United States District Chief Magistrate Judge

19
 20 Approved as to form:

21 /s/: Craig H. Bessenger
 22 CRAIG H. BESSENGER
 23 Clarence & Dyer LLP
 Attorneys for Defendant Jeffrey Harrison

24
 25 /s/: Denise Marie Barton
 26 DENISE MARIE BARTON
 Assistant United States Attorney

Proof of Service

I, Abbie Chin, declare as follows:

I am over eighteen years of age and not a party to the within action; my business address is 899 Ellis Street, San Francisco, California 94109; I am employed in the County of San Francisco.

On March 10, 2008, I served a copy, with all exhibits, of the following documents:

• **STIPULATION AND [PROPOSED] ORDER GRANTING DEFENDANT JEFFREY HARRISON'S TRAVEL REQUEST**

 X (BY ELECTRONIC SERVICE) I caused an electronic delivery subject to 28 U.S.C ¶1746, Local Rules or General Orders of this Court regarding Electronic Case Filing. All pleadings and papers must be electronically served in accordance with those Rules or General Orders with email address(es) as noted below:

Denise Marie Barton

United States Attorney's Office
450 Golden Gate Avenue, 11th Floor
Box 36055
San Francisco, CA 94102
415-436-7359
Fax: 415-436-7234
Email: denise.barton@usdoj.gov

 X (BY FAX) By transmitting by facsimile machine to the number addressed as below; the facsimile machine I used complied with California Rules of Court, rule 2003 and no error was reported by the machine. Pursuant to California Rules of Court, rule 2006(d), I caused the machine to print a transmission record of the transmission.

Rich Sarlatte

United States Pretrial Services
Fax: (415) 436-7517

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct and that this declaration was executed on the above stated date.

/s/: Abbie Chin
Abbie Chin